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**BRANDON | SMERBER**  
LAW FIRM

1 **SAO**

2 **LEW BRANDON, JR., ESQ.**

3 Nevada Bar No. 5880

4 **JEFFREY J. ORR, ESQ.**

5 Nevada Bar No. 7854

6 **JUSTIN M. PASQUALE, ESQ.**

7 Nevada Bar No. 15079

8 **BRANDON | SMERBER LAW FIRM**

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16 *Attorneys for Defendants,*

17 *99 CENTS ONLY STORES LLC and*

18 *MICHELLE TKACZ*

19 **UNITED STATES DISTRICT COURT**  
20 **DISTRICT OF NEVADA**

21 BETTY OUTLAW, an individual.

22 Plaintiff,

23 vs.

24 99 CENTS ONLY STORES LLC dba 99  
25 CENTS ONLY STORE #211, a Foreign  
26 Limited Liability Company; MICHELLE  
27 TKACZ, an individual; DOE STORE  
28 EMPLOYEE, an individual; DOES I through  
XX; and ROE BUISNESS ENTITIES I  
through XX, inclusive,

Defendants.

CASE NO.: 2:22-cv-01720-JCM-DJA

**STIPULATION AND ORDER TO**  
**DISMISS DEFENDANT MICHELLE**  
**TKACZ ONLY WITHOUT**  
**PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED TO by LEW BRANDON, JR., ESQ.,  
JEFFREY J. ORR, ESQ., JUSTIN M. PASQUALE, ESQ., of BRANDON | SMERBER LAW  
FIRM, on behalf of Defendants, 99 CENTS ONLY STORES LLC and MICHELLE TKACZ and  
MICHAEL T. NIXON, ESQ., of LADAH LAW FIRM, on behalf of Plaintiff, BETTY OUTLAW  
that Michelle Tkacz is to be dismissed without prejudice with all parties to bear their own fees  
and costs.

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1 This dismissal with without prejudice. Should Plaintiff wish to bring Michelle Tkacz back  
2 into this matter as a Defendant, the parties agree that it will relate back to the original Complaint.

3 DATED this 26th day of May, 2023.  
4 **BRANDON | SMERBER LAW FIRM**  
5

DATED this 1st day of June, 2023.  
**LADAH LAW FIRM**

6 /s/ Jeffrey J. Orr  
7 **LEW BRANDON, JR., ESQ.**  
8 Nevada Bar No. 5880  
9 **JEFFREY J. ORR, ESQ.**  
10 Nevada Bar No. 7854  
11 **JUSTIN M. PASQUALE, ESQ.**  
12 Nevada Bar No. 15079  
13 139 E. Warm Springs Rd.  
14 Las Vegas, NV 89119  
15 *Attorneys for Defendants,*  
16 *99 CENTS ONLY STORES LLC and*  
17 *MICHELLE TKACZ*

/s/ Michael Nixon  
**MICHAEL T. NIXON, ESQ.**  
Nevada Bar No. 12839  
517 South Third Street  
Las Vegas, NV 89101  
*Attorneys for Plaintiff,*  
**BETTY OUTLAW**

**BETTY OUTLAW V. 99 CENTS ONLY STORES, LLC**  
**CASE NO.: 2:22-cv-01720-JCM-DJA**

**IT IS SO ORDERED** that **MICHELLE TKACZ** to be dismissed without prejudice with all parties to bear their own fees and costs.

**IT IS FURTHER ORDERED**, should Plaintiff wish to bring Michelle Tkacz back into this matter as a Defendant, the parties agree that it will relate back to the original Complaint.

DATED June 2, 2023.

  
UNITED STATES DISTRICT JUDGE

*Respectfully submitted by:*

**BRANDON | SMERBER LAW FIRM**

/s/ Jeffrey J. Orr

**LEW BRANDON, JR., ESQ.**

Nevada Bar No. 5880

**JEFFREY J. ORR, ESQ.**

Nevada Bar No. 7854

**JUSTIN M. PASQUALE, ESQ.**

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139 E. Warm Springs Road

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*Attorneys for Defendants,*

**99 CENTS ONLY STORES LLC and**

**MICHELLE TKACZ**

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**BRANDON | SMERBER**  
**LAW FIRM**

## Meghan Allen

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**From:** Kavita Narh  
**Sent:** Thursday, June 1, 2023 12:28 PM  
**To:** Michael Nixon; Jeffrey Orr; Susan Lee  
**Cc:** Meghan Allen; Rachel Miles  
**Subject:** Re: Outlaw v. 99 Cents Stores

Thank you, we will send out the final draft today

Thank you,

Kavita Narh, Paralegal  
Brandon Smerber Law Firm  
139 East Warm Springs Road  
Las Vegas, Nevada 89119  
Direct: (702) 849-0895  
Tel: (702) 380-0007  
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**From:** Michael Nixon <mnixon@ladahlaw.com>  
**Sent:** Thursday, June 1, 2023 12:04 PM  
**To:** Kavita Narh <k.narh@bsnv.law>; Jeffrey Orr <j.orr@bsnv.law>; Susan Lee <s.lee@bsnv.law>  
**Cc:** Meghan Allen <M.Allen@bsnv.law>; Rachel Miles <rachelm@ladahlaw.com>  
**Subject:** RE: Outlaw v. 99 Cents Stores

You have approval.

Thank you.

Michael T. Nixon, Esq. ■ Attorney at Law



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**From:** Kavita Narh <k.narh@bsnv.law>  
**Sent:** Tuesday, May 30, 2023 8:39 AM  
**To:** Jeffrey Orr <j.orr@bsnv.law>; Michael Nixon <mnixon@ladahlaw.com>; Susan Lee <s.lee@bsnv.law>  
**Cc:** Meghan Allen <M.Allen@bsnv.law>; Rachel Miles <rachelm@ladahlaw.com>  
**Subject:** Re: Outlaw v. 99 Cents Stores